

BASE PENALTY MATRIX**Egregious Case****NO****YES****YES****(1)**

One-Half of

Transaction Value

(capped at \$125,000 per violation/
\$32,500 per TWEA violation)**(3)**

One-Half of

Applicable Statutory Maximum

Voluntary**Self-****Disclosure****NO****(2)**

Applicable Schedule Amount

(capped at \$250,000 per violation/
\$65,000 per TWEA violation)**(4)**

Applicable Statutory Maximum

Where the base penalty amount would otherwise exceed the statutory maximum civil penalty amount applicable to an apparent violation, the base penalty amount shall equal such applicable statutory maximum amount.